


Certain browser plug-ins or extensions, such as Grammarly, may interfere with submitting comments on the comment form. If you have issues, please disable browser plugins and extensions and try submitting your comment again. If you need additional assistance, please contact the Help Desk at 1-877-378-5457.



## Comment submitted by W. Jordan

The is a Comment on the **Environmental Protection Agency (EPA) Notice: Meetings: Federal Insecticide, Fungicide, and Rodenticide Act Scientific Advisory Panel; Nominations of Ad Hoc Panel Members**

For related information, [Open Docket Folder](#) 

Comment Period Closed

Mar 19 2018, at 11:59 PM ET

**ID:** EPA-HQ-OPP-2017-0693-0037

**Tracking Number:** 1k2-9240-jadn

### Document Information

**Date Posted:**

Mar 30, 2018

[Show More Details](#) 

### Comment

To the Members of the FIFRA Science Advisory Panel:

As you may know, in late December 2017, the Environmental Protection Agency ("EPA") announced that it has started to prepare two rulemakings to modify requirements in the Agricultural Worker Protection Standard ("WPS") and Certification of Pesticide Applicators rule (CPA). See 82 Fed. Reg. 60, 195 (Dec. 19, 2017); 82 Fed. Reg. 60,576 (Dec. 21, 2017). The WPS and CPA rules, which were updated in 2015 and 2017 following lengthy public engagement processes, are vital to the protection of the environment and public health - especially the health of children, women and men who labor in agriculture and who apply restricted use pesticides in agricultural, commercial and residential settings. Of great concern, the proposal to revise these rules will weaken protections for children who work in the fields or who mix, load and apply pesticides.

As you know, the Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA") requires that the FIFRA Scientific Advisory Panel be given 60 days to "comment as to the impact on health and the environment" of drafts of proposed FIFRA rules. 7 U.S.C. 136w(d)(1). With the lives of children and families and the quality of the environment at stake, we write to strongly urge you to conduct an in-depth scientific review of the health and environmental impacts of the proposed weakening of these rules on farmworkers, especially farmworkers who are under the age of 18, their families, and rural communities. In particular, we ask that

you: 1) conduct a full review of the draft proposals to modify the WPS and CPA rules; 2) add these matters to the agenda of one of the SAP's public meetings - either a meeting devoted exclusively to these matters or to the agenda of the upcoming meeting in May 2018; and 3) issue written findings on your conclusions.

Thank you very much for your consideration.  
William Jordan